

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

FILED  
CLERK'S OFFICE

APR 2 2004

CANDY M. SOUSA, On Behalf of Herself  
and All Others Similarly Situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION,  
JOHN E. BAGALAY, JR., STEVEN K.  
SPRAGUE and GERARD T. FEENEY,

Defendant.

U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
Civil Action No. 04-cv-30022 (MAP)

YOSEF STREICHER, On Behalf of  
Himself and All Others Similarly Situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION,  
JOHN E. BAGALAY, JR., STEVEN K.  
SPRAGUE and GERARD T. FEENEY,

Defendant.

Civil Action No. 04-cv-30026 (MAP)

**NOTICE OF MOTION OF THE TREBITSCH GROUP'S  
REQUEST FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS,  
AND FOR APPROVAL OF CHOICE OF LEAD COUNSEL**

RAFAT DAWOD,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION,  
STEVEN SPRAGUE and GERARD T.  
FEENEY,

Defendant.

Civil Action No. 04-cv-30029 (MAP)

ALVIN CHESS, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION,  
STEVEN K. SPRAGUE and GERARD T.  
FEENEY,

Defendant.

Civil Action No. 04-cv-30037 (MAP)

MICHAEL VICKER, On Behalf of  
Himself and All Others Similarly Situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION,  
JOHN E. BAGALAY, JR., STEVEN K.  
SPRAGUE and GERARD T. FEENEY,

Defendant.

Civil Action No. 04-cv-30040 (MAP)

**[ADDITIONAL CAPTIONS ON NEXT PAGE]**

H. MARTIN BOHMAN, On Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION,  
STEVEN SPRAGUE and GERARD T.  
FEENEY,

Defendant.

Civil Action No. 04-cv-30041 (MAP)

JIMMY SUO, On Behalf of Himself and  
All Others Similarly Situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION,  
STEVEN SPRAGUE and GERARD T.  
FEENEY,

Defendant.

Civil Action No. 04-cv-30042 (MAP)

JACK SCHULMAN, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

WAVE SYSTEMS CORPORATION,  
STEVEN SPRAGUE and GERARD T.  
FEENEY

Defendant.

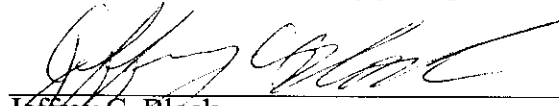
Civil Action No. 04-cv-30043 (MAP)

The members of the Trebitsch Group, by their counsel, hereby respectfully move this Court to: (i) consolidate all related actions; (ii) be appointed Lead Plaintiffs in the consolidated securities class action; and (iii) approve their selection and retention of Zimmerman, Levi & Korsinsky LLP as Lead Counsel and Berman DeValerio Pease Tabacco Burt & Pucillo as Liaison Counsel.

In support of this Motion, the proposed lead plaintiffs submit herewith a Memorandum of Law, the Declaration of Eduard Korsinsky, Esq., and a Proposed Order.

Dated: April 1, 2004

BERMAN DEVALERIO PEASE TABACCO  
BURT & PUCILLO



---

Jeffrey C. Block  
Michael T. Matraia  
Nicole R. Starr  
One Liberty Square  
Boston, Massachusetts 02109  
Telephone: (617) 542-8300  
Facsimile: (617) 542-1194

Proposed Liaison Counsel For Plaintiffs

ZIMMERMAN, LEVI & KORSINSKY, LLP  
Eduard Korsinsky  
39 Broadway, Suite 1440  
New York, New York 10006  
Tel: (212) 363-7500  
Fax: (212) 363-7171

-and -

ZIMMERMAN, LEVI & KORSINSKY, LLP  
Jean Marc Zimmerman  
226 St. Paul Street  
Westfield, New Jersey 07090  
Tel: (908) 654-8000  
Fax: (908) 654-7207

Proposed Lead Counsel for Plaintiffs